

### REMARKS

Applicants respectfully request that the above-identified patent application be reexamined and reconsidered.

Claims 1-23 are now pending in this application. In an Office Action dated January 15, 2003 (hereinafter "Office Action"), Claims 1-23 were finally rejected under 35 U.S.C. § 103(a) as being unpatentable over Buchanan (U.S. Patent No. 5,758,355). In view of the comments of the March 3, 2003, telephone conference, applicants hereby cancel Claims 16-23 to expedite the prosecution of Claims 1-15. Applicants cancel Claims 16-23 in this application without prejudice for further prosecution of these claims in a continuation application. Pursuant to 37 C.F.R. § 1.116, and for the reasons set forth below, applicants respectfully request reconsideration and allowance of this application.

#### Record of the Telephonic Conference:

Applicants thank Examiner Woo for the telephone conference of March 3, 2003. During the conference, Examiner Woo and the undersigned discussed specific distinctions between applicants' claimed method and the methods disclosed in Buchanan. It was agreed that Buchanan's method of downloading a "distribution table" is a different from applicants' claimed method of downloading a "server computer database." This distinction, and others, are described in more detail below.

#### Summaries of the Invention and Cited Reference

Prior to discussing in detail why applicants believe that all of the claims in the application are allowable, a brief description of applicants' invention and the cited references is provided. The following discussion of the disclosed embodiments of applicants' invention and the

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teachings of the applied references is not provided to define the scope or interpretation of any of applicants' claims. Instead, such discussed differences are provided to help the U.S. Patent and Trademark Office (hereinafter "the Office") better appreciate important claim distinctions discussed thereafter.

### Summary of the Invention

The present invention is directed to a method, system, and computer product that employ time relationships to reduce the amount of data transferred between computing devices during the synchronization of duplicate databases stored on a server and client. The present invention analyzes the time relationship of data stored in duplicate databases to determine the type of download that is executed between the client and server. For example, the server downloads a database file to the client, if the last access time of the client database is earlier than the creation time of the server database. Alternatively, the server selectively downloads individual data objects from the server database to the client database, if the last access time of the client database is not earlier than the creation time of the server database. As described on page 3, lines 22-26, of applicants' specification, the method and system of the present invention allow users to access and manipulate data stored in duplicate databases while reducing the amount of data transferred during a database synchronization.

The benefits of the invention are achieved by the utilization of the different types of download techniques described above. The present application claims a downloading procedure that involves "downloading the server computer database to the client computer, if the client computer database last server access time indicates a time that is earlier than a time indicated by the creation time of the server computer database." All of the claims remaining in the application include this feature.

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### Summary of Buchanan

Buchanan discloses a system and method for synchronizing a database. The system disclosed in Buchanan includes a server database and different subsets of the server database located in a number of client computers. *See Buchanan*, Col. 4, lines 42-44. In addition to the server database, the server maintains structures, which are referred to as "distribution tables." *Id.*, Col. 4, lines 46-49. A distribution table is a separate structure than the server database. Col. 3, lines 33-34. One method disclosed in Buchanan utilizes the "distribution tables" to locate information in the server database that may require extraction during the synchronization of a database. *Id.*, Col. 3, lines 32-36. The distribution tables are purportedly used to identify related server database tables that may contain information to be extracted based upon changed relationships among information in the server database, rather than based upon some change in the actual contents of such related server tables. *Id.*, Col. 3, lines 41-47.

One embodiment disclosed in Buchanan includes transferring a "distribution table" from a server to a client if the table has been updated. *Id.*, Col. 6, lines 24-27. In one specific example, time stamp information and other modifier information is used to determine if a distribution table is downloaded from a server to a client. *Id.*, Col. 6, lines 18-19. As noted in Buchanan, the transfer of the distribution table is used to provide a distribution flag which indicates whether or not distribution requirements for a synchronizing client has changed. *Id.*, Col. 6, lines 31-34. In the disclosed embodiments of Buchanan, the methods involve the transfer of the "distribution tables," and the transfer of the distribution table does not involve the transfer of the actual data of the database. Buchanan does not teach or suggest applicants' claimed method that involves the "downloading of the server computer database."

### Rejection of Claims 1-15 Under 35 U.S.C. § 103(a)

The Office Action again rejected Claims 1-23 under 35 U.S.C. § 103(a) as being unpatentable over Buchanan. The Office Action reiterated its basis of the rejection by citing Figure 1 and Col. 1, lines 11-25; Col. 2, lines 17-60; Col. 6, lines 8-63; Col. 4, lines 18-30; Col. 11, lines 50-67; and Col. 12, lines 1-26 as support for Buchanan's alleged disclosure of the elements of Claim 1. The Office Action asserts that Buchanan suggests each and every element of Claim 1. As described in more detail below, applicants respectfully disagree. Pursuant to 37 C.F.R. § 1.116, and for the reasons set forth below, applicants respectfully request reconsideration and allowance of this application.

With regard to Claims 1 and 8, applicants claim a method for dynamically synchronizing a duplicated database stored on a server and a client computer. The method is directed to a plurality of actions, including the action of "downloading *the server computer database* to the client computer, if the client computer database last server access time indicates a time that is earlier than a time indicated by the creation time of the server computer database." In brief, the method involves the "downloading the server computer database" if one condition is met.

Conversely, Buchanan describes a method where a server transfers a "table" (which is also referred to as a "distribution table") if there has been an update since the last synchronization of a client. *Buchanan*, Col. 6, lines 25-30. While it is true that Buchanan discloses a synchronization method, applicants respectfully submit that the downloading of a distribution table, which is distinct from the server database (*Id.*, Col. 3, lines 33-34), does not disclose or suggest applicants' claimed method involving the "downloading of the server computer database."

The method and system disclosed in Buchanan is much different than applicants' claimed method. First, as defined in Buchanan, the "distribution tables" are a separate structure than the

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server database. Buchanan states that, "in addition to the server database, the server system maintains structures in electronic memory, which shall be transferred to herein as distribution tables, which inform a database synchronization process of the distribution information which is to be extracted from the server database tables for distribution to different client databases." *Id.*, Col. 4, lines 45-50. In other words, a process of transferring a distribution table is not related to a process of downloading a server computer database.

Second, the transfer of the distribution table is used to provide a distribution flag that indicates whether or not distribution requirements for a synchronizing client have changed. *Id.*, Col. 6, lines 31-34. The transfer of the distribution tables also identify information in related server database tables that requires extraction. *Id.* This is much different than the function and purpose of applicants' claimed invention, as the transfer of the distribution table does not transfer the actual data of the database. Based on these differences of the function and purpose of applicants' claimed invention versus the function and purpose of the disclosed methods of Buchanan, applicants submit that there is no suggestion of a method of "downloading *the server computer database* to the client computer, if the client computer database last server access time indicates a time that is earlier than a time indicated by the creation time of the server computer database."

Claims 1 and 8 also define alternate downloading methods that are each executed based on the result of at least one condition. More specifically, Claims 1 and 8 are directed to the actions of:

downloading the server computer database to the client computer,  
if the client computer database last server access time indicates a time that  
is earlier than a time indicated by the creation time of the server computer  
database; [and]

selectively downloading data objects stored in the server computer  
database to the client computer database, if the client computer database

last server access time indicates a time that is not earlier than a time indicated by the creation time of the server computer database . . . .

As distinctly defined in Claims 1 and 8 and described in the specification on page 3, line 24, to page 4, line 7, applicants' method synchronizes duplicate databases by either (1) downloading a database to a client computer, or (2) selectively downloading data objects stored in the server computer database to the client computer database. In brief, the server downloads a server computer database to a client computer if one result of a condition occurs, or selectively downloads individual objects if another result of the condition occurs. The type of download that is executed between the server and client is determined by a comparison between a creation time of the server database and an access time of the client database.

While it is true that Buchanan discloses a method where a table is transferred if an update has occurred, Buchanan fails to suggest a method that involves alternate types of downloading methods that are selected based on the result of a condition. More specifically, Buchanan fails to teach or suggest a method where (1) one type of download occurs if the client computer database last server access time indicates a time that is earlier than a time indicated by the creation time of the server computer database, and (2) another type of download occurs if the client computer database last server access time indicates a time that is *not* earlier than a time indicated by the creation time of the server computer database.

Since Buchanan does not teach or suggest each and every element of applicants' claimed invention, and because Buchanan does not suggest applicants' claimed combination of downloading methods, applicants respectfully submit that the Office has not established a *prima facie* case of obviousness, and respectfully request that the rejection of the claims be withdrawn.

Since Claims 2-5 and 9-13 respectively depend from Claims 1 and 8, and Claims 6, 7, 14, and 15 are computer-readable medium and system claims having language that parallels the language of Claims 1 and 8, the analysis applied to Claims 1 and 8 also applies to these claims

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and their respective dependent claims. Therefore, applicants respectfully submit that Claims 2-7 and 9-15 are in condition for allowance for the same reasons as Claims 1 and 8.

CONCLUSION

In view of the foregoing remarks, it is submitted that the present application is now in condition for allowance. Reconsideration and reexamination of the application, and allowance of the claims are solicited. If the Examiner has any questions or comments concerning this matter, the Examiner is invited to contact applicants' undersigned attorney at the number below.

Respectfully submitted,

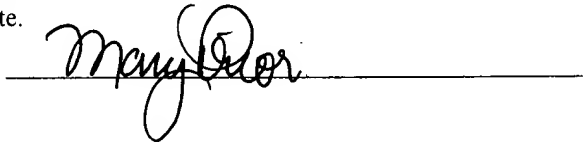
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